



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

OFFICE OF THE
REGIONAL ADMINISTRATOR

29 APR 2016

Ms. Amy Snively
U.S. Army Corps of Engineers
Kansas City District
608 E. 12th Street, Room 529
Kansas City, Missouri 64016

Dear Ms. Snively:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Next NGA West Campus in the Greater St. Louis Metropolitan Area. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The FEIS was assigned the CEQ number 20160067.

The FEIS analyzes the potential environmental impacts associated with siting, constructing, and operating the Next NGA West Campus in the St. Louis, Missouri metropolitan area. In addition to the No Action alternative, four alternative locations for the Next NGA West Campus are under review, including the Fenton Site (St. Louis County, Missouri), Mehlville Site (St. Louis County, Missouri), St. Louis City Site (City of St. Louis, Missouri) and St. Clair County Site (St. Clair County, Illinois). The FEIS has identified the St. Louis City Site as the preferred alternative.

In our November 23, 2015, comment letter, EPA assigned a rating of EC-2 (Environmental Concerns-Insufficient Information) for each of the four action alternatives included in the Draft EIS. This rating was based on EPA's need for additional information in order to assess potential environmental effects and our recommendations for clearer avoidance, minimization and mitigation commitments. We suggested that the FEIS include further discussion on characterizations and level of analysis for pre-acquisition activities, hazardous materials and contamination, project siting, endangered species, socioeconomics, Waters of the U.S., air, green infrastructure, sustainability, transportation, environmental justice and historic preservation. We appreciate subsequent communication between EPA Regions 5 and 7 and the U.S. Army Corps of Engineers to address our comments. Information in the FEIS adequately addresses EPA's questions and concerns. We are supportive of new protective measures, such as a commitment to use EPA's Diesel Emissions Reduction Checklist, which will help protect human health during construction.

Section 3.8.3.3 of the FEIS indicates that Phase I archaeological investigations following the Missouri State Historic Preservation Officer guidelines were recommended if the St. Louis City Site was selected. We recommend that the results of these and any subsequent investigations be referenced and/or included within the Record of Decision.



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We understand that a draft Programmatic Agreement under Section 106 of the National Historic Preservation Act has been circulated for public comment and will be finalized prior to the issuance of the ROD. EPA commends your continued coordination efforts with the City of St. Louis, Advisory Council on Historic Preservation, Missouri and Illinois State Historic Preservation Officers and other consulting parties and neighborhood residents. We encourage ongoing coordination as facility design planning and implementation activities commence.

The FEIS estimates that the population of the 17 block groups entirely or partially within the Region of Influence for the St. Louis City site is 89.3 percent minority and 83.2 percent low income. The area has also faced historic environmental challenges. The FEIS concludes that there are likely to be populations with Environmental Justice concerns associated with the St. Louis City Site. We understand that the City of St. Louis will be the responsible entity for carrying out related avoidance, minimization and mitigation efforts, including relocation, prior to federal property acquisition. EPA encourages continued complementary community outreach efforts by NGA to address the community's concerns.

EPA thanks you for addressing the recommendations expressed in our DEIS comment letter. We appreciate the opportunity to review and comment on the FEIS for the Next NGA West Facility. If you have questions regarding these comments, the staff contact for this project is Amber Tilley; she can be reached at 913-551-7565 or R7_NEPA@epa.gov. For questions regarding comments pertaining specifically to the St. Clair County Site, please contact Jennifer Blonn, of our Chicago office, at 312-886-6394 or blonn.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Hague', with a long horizontal flourish extending to the right.

Mark Hague